


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

MARY BLOODSWORTH and)	
JERRY BLOODSWORTH,)	
)	
Plaintiffs,)	
)	
vs.)	CIVIL ACTION NO. 2:05cv622-D
)	
SMITH & NEPHEW, et al.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR PERMISSION TO SUBMIT
A RESPONSIVE MEMORANDUM BRIEF TO
"SMITH & NEPHEW'S OPPOSITION TO
PLAINTIFFS' MOTION TO REMAND"

Come now Mary Bloodsworth and Jerry Bloodsworth and ask this Court to accept the attached responsive memorandum brief to "Smith & Nephew's Opposition to Plaintiffs' Motion to Remand." This Court previously entered an order giving Smith & Nephew until August 15, 2005, to show cause why the plaintiffs' motion to remand should not be granted but not providing for the submitting of any response by the Bloodsworths. Plaintiffs request an opportunity to so respond.

Respectfully submitted by:



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OF COUNSEL:

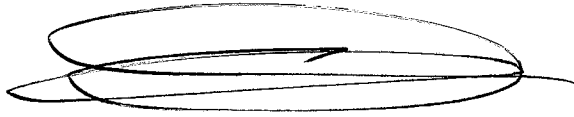
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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing motion upon all counsel of record by placing same in the United States Mail, proper first-class postage prepaid and properly addressed, to:

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Done this 19th day of August, 2005.



OF COUNSEL